

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street,
San Francisco, CA 94104
Telephone: (415) 439-1400
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
Christopher D. Cox (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, state as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer this
4 Declaration in the above-captioned matter in support of Uber’s Motion for Entry of an Order to Show
5 Cause Why 7 Plaintiffs Who Have Submitted Non-Bona-Fide Receipts Should Not Be Dismissed with
6 Prejudice.
7

8 2. Attached as **Exhibit 1** is a true and correct copy of a bona fide, itemized receipt from Uber’s
9 systems for a ride that occurred on November 9, 2023, and totaled \$23.38.

10 3. Attached as **Exhibit 2** is a purported receipt submitted by Plaintiff with MDL ID 3962.

11 4. Attached as **Exhibit 3** is a purported receipt submitted by Plaintiff with MDL ID 3286.

12 5. Attached as **Exhibit 4** is a true and correct copy of a bona fide, itemized receipt from Uber’s
13 systems for a ride that occurred on August 30, 2023, and totaled \$38.91.
14

15 6. Attached as **Exhibit 5** is a purported receipt submitted by Plaintiff with MDL ID 3666.

16 7. Attached as **Exhibit 6** is a true and correct copy of a bona fide, itemized receipt from Uber’s
17 systems for a ride that occurred on August 31, 2024, and totaled \$12.94.

18 8. Attached as **Exhibit 7** is a purported receipt submitted by Plaintiff with MDL ID 3699.

19 9. Attached as **Exhibit 8** is a true and correct copy of a bona fide, itemized receipt from Uber’s
20 systems for a ride that occurred on July 29, 2023, and totaled \$18.95.
21

22 10. Attached as **Exhibit 9** is a purported receipt submitted by Plaintiff with MDL ID 3621.

23 11. Attached as **Exhibit 10** is a purported receipt submitted by Plaintiff with MDL ID 3787.

24 12. Attached as **Exhibit 11** is a true and correct copy of a bona fide, itemized receipt from Uber’s
25 systems for a ride that occurred on May 25, 2024, and totaled \$17.54.

26 13. Attached as **Exhibit 12** is a purported receipt submitted by Plaintiff with MDL ID 3877.
27
28

1 14. Attached as **Exhibit 13** is a true and correct copy of a bona fide, itemized receipt from Uber's
2 systems for a ride that occurred on May 29, 2024, and totaled \$25.92.

3 15. Attached as **Exhibit 14** is a purported receipt submitted by Plaintiff with MDL ID 3977.

4 16. Attached as **Exhibit 15** is a purported receipt submitted by Plaintiff with MDL ID 3921.

5
6 I declare under the penalty of perjury under the laws of the United States that the foregoing is
7 true and correct.

8 Dated: October 13, 2025

9 Respectfully submitted,

10 

11 By:

12 Christopher V. Cotton (admitted *Pro Hac*
13 *Vice*)

14 **SHOOK, HARDY & BACON L.L.P.**

15 2555 Grand Blvd.

16 Kansas City, MO 64108

17 Telephone: (816) 474-6550

18 ccotton@shb.com

19 *Attorney for Defendants*

20 UBER TECHNOLOGIES, INC.; RASIER,
21 LLC; and RASIER-CA, LLC
22
23
24
25
26
27
28